

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI

In re

HARVEY CLOLINGER

Debtor

Case No. 20-10127-JDW

Chapter: 7

MOTION TO LIFT STAY BY HOLLEY CREDIT UNION

Comes now, your creditor, Holley Credit Union, and moves the Court to lift the automatic stay as to the 2017 Dodge Charger, VIN 2C3CDXHG7HH505072. Holley Credit Union would state unto the Court as follows:

1. On or about July 5, 2017, the Debtor, Harvey Clolinger, executed and entered into a Retail Installment Sale Contract – Simple Finance Charge. A copy of the Agreement is attached hereto as Exhibit “A”.
2. The agreement was for the purchase of a 2017 Dodge Charger, VIN 2C3CDXHG7HH505072.
3. The Agreement was assigned to Holley Credit Union.
4. Holly Credit Union reflected their lienholder interest in accordance with the laws of the state of Kentucky. A copy of which is attached hereto as Exhibit “B”.
5. The Debtor’s petition indicates that the Debtor intends to surrender the Vehicle.
6. The creditor is not being protected as the Debtor is not making payments towards the Vehicle and the Creditor is not provided for in the Debtor’s petition.

WHEREFORE, PREMISES CONSIDERED, said creditor moves the Court to lift the automatic stay.

STONE, HIGGS & DREXLER

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BWR/20-00291-0

CERTIFICATE OF SERVICE

The following individuals were served the above pleading on March 6, 2020:

DEBTOR, Harvey and Crystal Colinger, 328 Fountain Cove East, Hernando, Mississippi 38632

DEBTOR ATTORNEY, Robert H. Lomenick, Jr., Attorney at Law – Via ECF

TRUSTEE, Jeffrey A. Levingston – Via ECF

US TRUSTEE, Via ECF

/s/ Brittan Webb Robinson